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May 31, 2023

By Electronic Case Filing

Hon. Lewis J. Liman
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
Room 1620
New York, NY 10007-1312

The Court is prepared to sign the protective order if the words "unless if required by law" or words to similar effect are added to the alterations in Paragraph 12. The parties are directed to file an updated version of the protective order for the Court's signature. 6-1-23.

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Re: *Froedtert Health, Inc., et al. v. Ironshore Specialty Ins. Co.*
Case No. 22-cv-10829-LJL
Proposed Protective Order

Dear Judge Liman:

Per § (2)(G) of the Court's Individual Practices in Civil Cases, the Parties seek the entry of a protective order. Plaintiffs wish to alter the Court's Model Protective Order. The Parties have conferred regarding the alterations and Defendant Ironshore does not object. Accordingly, attached as Exhibit A to this letter is a redlined version of the Court's Model Protective Order showing the proposed changes. Attached as Exhibit B is a clean version for entry should the Court accept the parties' proposed changes.

Very truly yours,

John S. Vishneski III

John S. Vishneski III

JSV:cp

cc: Brian Margolies
John B. Berringer
Claire M. Whitehead